

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
DNA-AZ-130-2005-0045

U.S. Department of the Interior Bureau of Land Management

A. Describe the Proposed Action

The Bureau of Land Management proposes to treat approximately 1,100 acres of Wyoming big sagebrush (*Artemisia tridentata* var. *wyomingensis*) with an aerial application of the dry pellet form of the herbicide Tebuthiuron, trade named Spike 20P. The Spike pellets would be applied aerially by a fixed wing aircraft at the rate of 0.4 lbs. active ingredient per acre. Species composition of sagebrush would be reduced from 58 percent to 10-20 percent. An adequate understory of native species exists to result in increased species composition of herbaceous vegetation, post treatment. Treatment implementation would begin and be completed in the fall of 2005. The proposed treatment area would include portions of T. 34 N., R. 12 W., Sections 10,14,15, 16, 21, 22, 23, & 24.

B. Land Use Plan (LUP) Conformance

LUP* Name; Arizona Strip District Resource Management Plan (RMP) and Final Environmental Impact Statement/Shivwits Resource Area Implementation Plan

Date Approved: January 1992

LUP* Name; Shivwits Grazing Environmental Impact Statement (EIS)

Date Approved: July 1980

LUP* Name; Vegetation Treatment on BLM Lands in Thirteen Western States Final EIS

Date Approved: May 1991

LUP* Name; Parashant Interdisciplinary Management Plan

Date Approved: October 1997

LUP* Name; Red Pond Allotment Management Plan (AMP)

Date Approved: January 1999

LUP* Name; Grand Canyon-Parashant National Monument Proclamation

Date Approved: January 2000

LUP* Name; Interim Management Policy; Addendum to the Grand Canyon-Parashant National Monument Agreement

Date Approved: July 2004

LUP* Name; AZ Statewide LUP Amendment for Fire, Fuels, and Air Quality Management

Date Approved: September 2004

* List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

Parashant Interdisciplinary Management Plan (1997): p.24 (DPC-2). Desired Plant Community (DPC) Objectives for sagebrush communities on the Shallow Loamy 9-13" p.z. ecological site.

DPC Objectives for the Shallow Loamy Upland 9-13" p.z. Ecological Site			
Plant species	Present Composition %	Site Allowable %	DPC %
Trees/Shrubs as a Group	79%	20-35%	10-65%
Pinyon/Juniper	3%	0-10%	0-2%
Sagebrush	58%	5-30%	2-50%
Other shrubs	18%	10-35%	10-45%
Cool season grasses (Sihy,Orhy,Stco)	9%	40-60%	10-40%
Warm season grasses (Bogr,Spcr,Boer)	4%	19-40%	5-40%
Forbs	8%	2-10%	2-10%

Red Pond AMP (1999): p.GM-19, 20. AMP objective 1; Reduce the amount of sagebrush from 60% to 0-20% and increase the composition of grasses and forbs from 21% to 60-85% in the identified sagebrush areas on the Red Pond allotment within 10 years of plan approval.

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Arizona Strip RMP: Table II-1. Vegetative treatment projects are implemented where plant cover or soil productivity is being lost, to achieve a desired plant community, to improve habitat conditions for wildlife or to meet activity plan objectives. Practices used to accomplish this include mechanical treatment, herbicide applications, biological treatments, prescribed fire, reseeding and construction of water control structures.

Shivwits Resource Area Implementation Plan: p.12; GM06. Continue implementing the Shivwits grazing management program as described in the Grazing EIS which specifies grazing systems, management facilities and land treatments, provided they are consistent with other RMP decisions. Practices used to accomplish this include mechanical treatment, herbicide applications, biological treatments, prescribed fire, reseeding and construction of water control structures. p.23; WS01. Manage vegetation cover towards ecological stability and sound long term protective soil cover using mechanical, chemical, biological or fire as tool for accomplishment.

Shivwits Grazing EIS: p.26. Land treatments, such as mechanical treatment of pinyon and juniper and spraying or plowing sagebrush would increase production and improve range conditions.

Vegetation Treatment on BLM Lands in Thirteen Western States Final EIS (FEIS): p.1-3; A key objective of the Vegetative Treatment Program is to increase soil stability, improve quality and sustained yield of water, reduce the spread of noxious weeds and increase desired plant species to meet objectives of the land use plans.

AZ Statewide LUP Amendment for Fire, Fuels, and Air Quality Management: p. 25; reiterates GM06, as stated above.

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- Parashant Interdisciplinary Management Plan Management Actions Implementation EA-AZ-010-96-17, 1996

- Duncan Tank, Belnap and Hurricane Rim Vegetation Treatment EA-AZ-010-98-07, 1998
- Wolfhole Valley Vegetation Enhancement, 1992

Cultural Resource Compliance Record Number

- BLM-130-2005-066

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

Documentation of answer and explanation:

Yes. Reducing the composition of Wyoming big sagebrush by aerial application of the herbicide tebuthiuron at an application rate of 0.4 lbs. active ingredient has been analyzed in prior environmental assessments (EAs). The proposed action and location are specifically analyzed in the Parashant Interdisciplinary Management Plan Management Actions Implementation EA and Decision Record (DR).

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation:

Yes. Several alternatives were considered but eliminated from detailed analysis because they would not produce substantial differences in environmental impacts, and were more cost prohibitive than the proposed action.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; endangered, proposed, and candidate species; most recent BLM list of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation:

Yes. New circumstances since existing analysis were completed include the designation of the area as a National Monument and the potential presence of California condors, an Endangered Species Act 10(j) status species. The proposed action is expected to have no effect on monument objects nor listed species.

The Grand Canyon-Parashant National Monument (GCPNM) was created by Presidential Proclamation on January 11, 2000. The proposed action would have no effect on objects of historic or scientific interest in the monument.

No new roads or trails would be created to access the treatment area, and there would be no new surface disturbance which could impact Monument objects.

The proposed action would have no effect on California condors.

4. Do the method and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation:

Yes. The method and analytical approach used in the existing NEPA documents still complies with CEQ regulations and BLM standards. State of the art technology is utilized during the aerial application of Spike 20P herbicide. Global Positioning System (GPS), LandSat mapping technology and an electronic metering device on board the aircraft would assure the applicator of the exact treatment area and application rates.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

Yes. EA-AZ-010-96-17 is site specific for the proposed action. This NEPA document, as well as the others documented above, analyzes impacts from the proposed action on vegetation, wildlife, threatened and endangered species, cultural resources, visual resources, livestock grazing, and recreational opportunities. A screening group consisting of the monument manager, assistant monument manager, and monument staff has reviewed the proposed project and existing EA. The group has determined the project is consistent with the monument proclamation and interim management guidelines. (See Project Consistency with Monument Values and Interim Guidelines Memo dated 7/13/04).

A direct effect addressed in the existing EAs is a transition to less Wyoming big sagebrush and more native grasses in the vegetation community. This would be a site specific effect of the proposed action.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

Yes. Cumulative impacts of implementing the proposed action were analyzed in the Parashant Interdisciplinary Management Plan Management Actions Implementation EA. No negative cumulative impacts were identified. However, past and future tebuthiuron treatments may cumulatively reduce sediment loading into nearby tributaries was identified.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation:

Yes. The existing EA analyzing the proposed action was reviewed by an interdisciplinary team of federal and state agency personnel. The existing EA and other NEPA documents were noticed and opportunities

to comment provided to state agencies, environmental groups, Native American Tribes, affected land users, and interagency personnel. The Arizona Strip RMP also included extensive public involvement.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.

Required reviews:

Dennis Curtis, GCPNM Monument Manager
Kathleen Harcksen, GCPNM Assistant Monument Manager
Gloria Benson, Native American Coordinator
Michelle Bailey, Recreation
Tom Folks, Recreation
Laurie Ford, Lands/Reality/Minerals
Michael Herder, Wildlife Team Lead
John Herron, Cultural Resources
Lee Hughes, T&E Plants
Bob Sandberg, Range Team Lead
Linda Price, S&G Coordinator
Ron Wadsworth, Supervisory Law Enforcement
Richard Spotts, Environmental Coordinator
Ray Klein, GCPNM Supervisory Ranger
Roger Taylor, Arizona Strip District Manager

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that applicable mitigation measures must be incorporated and implemented.

The following mitigation measures must be incorporated into the implementation of the project:

1. Herbicide will not be applied when the ground is frozen, saturated, or if snow is covering the ground surface.
2. Herbicide will be applied ¼ mile away from open water sources, ponds or reservoirs.
3. Treatment area will be deferred from livestock grazing for at least two growing seasons following application.
4. To ensure and mitigate proper stocking of the new treatment, livestock numbers will be reviewed and a determination made prior to post treatment turn-out as to full or a reduced stocking level.
5. A licensed applicator will apply the herbicide using a positive metering devise, and will occur in late summer or fall.

Conclusion

[] Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA

Note: If you found that one or more of these criteria is not met, you will not be able to check this box.

Signature of the Responsible Official

Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

Guidelines for Using the DNA Worksheet and Evaluating the NEPA Adequacy Criteria

These guidelines supplement the policies contained in the Instruction Memorandum entitled “Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy”. During preparation of this worksheet, if you determine that one or more of the criteria are not met, you do not need to complete the Worksheet. If one or more of these criteria is not met, you may reject the proposal, or complete appropriate NEPA compliance (EA, EIS, Supplemental EIS, or CX if applicable) and plan amendments before proceeding with the proposed action. Documenting why the criterion (criteria) has (have) not been met may be beneficial in preparing new or supplemental NEPA documents, however.

Criterion 1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action at a site specifically analyzed in an existing NEPA document? In the limited situations in which an existing NEPA document(s) can properly be relied upon without supplementation, explain whether and how the existing documents analyzed the proposed action (include page numbers). If there are differences between the actions included in existing documents and the proposed action, explain why they are not considered to be substantial.

Criterion 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests and resource values? Explain whether the alternatives to the current proposed action that were analyzed in the existing NEPA documents and associated record constitute a reasonable range of alternatives with respect to the current proposed action, and if so, how. Identify how current issues and concerns were addressed within the range of alternatives in existing NEPA documents. If new alternatives are being proposed by the public to address current issues and concerns, and you conclude they do not need to be analyzed, explain why.

Criterion 3. Is the existing analysis valid in light of any new information or circumstances? New information or circumstances could include the following. If any of the listed items below are applicable, you need to determine whether it (they) constitute(s) new information or circumstances.

- a. New standards or goals for managing resources. Standards and goals include, but are not limited to: BLM’s land health standards and guidelines, recovery plans for listed species prepared by the Fish and Wildlife Service or National Marine Fisheries Service, requirements contained in a biological opinion or conference report related to Section 7 of the Endangered Species Act, and the requirement to address disproportionate impacts on minority populations and low income communities (E.O. 12898).
- b. Changes in resource conditions within the affected area the existing NEPA analyses were conducted, e.g., changes in habitat condition and trend; listed, proposed, candidate, and Bureau designated sensitive species; water quality, including any identified impaired water bodies under Section 303 of the Clean Water Act; air quality; vegetation condition and trend; soil stability; visual quality; cultural resource condition; and wildlife population trend(s); etc.
- c. Changes of resource-related plans, policies, or programs of State and local governments, Indian tribes, or other federal agencies.
- d. Designations established in the affected area since the existing NEPA analysis and documentation was prepared. Designations include, but are not limited to wilderness, wilderness study areas, National Natural Landmarks, National Conservation Areas, National Monuments, National Register properties, Areas of Critical Environmental Concern, and Research Natural Areas.

Criterion 4. Do the methodology and analytical approach used in the existing NEPA document continue to be appropriate for the proposed action? Explain how the methodologies and analytical approach used in the existing NEPA document are current and sufficient for supporting approval of the proposed action. If valid new technologies and methodologies (e.g. air quality modeling) exist, explain why it continues to be reasonable to rely on the method previously used.

Criterion 5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action? Review the impact analysis in the existing NEPA document(s). Explain how the direct and indirect impacts of the proposed action are analyzed in the existing NEPA documents, and would, or would not, differ from those identified in the existing NEPA document. Consider the effect new information or circumstances may have on the environmental impacts predicted in the existing NEPA document.

Criterion 6. Are the cumulative impacts that would result from implementation of the proposed action substantially unchanged from those identified in the existing NEPA document(s)? Would the current proposed action, if implemented, change the cumulative impact analysis? Consider the impacts analysis in existing NEPA documents, the effects of relevant activities that have been implemented since existing NEPA documents were completed and the effects of the current proposed action.

Criterion 7. Is the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Explain how the nature of public involvement in previous NEPA documents continues to be adequate and valid in light of current issues, concerns, views, and controversies.